

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION

ROCKSTAR CONSORTIUM US LP )  
AND NETSTAR TECHNOLOGIES LLC, )

Plaintiffs, )

v. )

GOOGLE INC. )

Defendant. )

Civil Action No. 13-cv-00893-RG

**JURY TRIAL DEMANDED**

**GOOGLE INC.'S OPPOSITION TO NON-PARTIES NORTEL NETWORKS  
CORPORATION AND NORTEL NETWORKS LIMITED'S MOTION FOR A  
PROTECTIVE ORDER UNDER FEDERAL RULES OF CIVIL PROCEDURE 26(c)  
AND 45(d)(3)**

Before this Court are two motions for Protective Orders brought by Nortel Networks Inc. (“NNI”) (Dkt. No. 150) and Nortel Networks Corporation (“NNC”) and Nortel Networks Limited (“NNL”) (Dkt. No. 152) seeking a Protective Order asking the Court to preclude Plaintiff Rockstar from producing documents that Rockstar was already required to have “substantially” produced to Google by this Court’s Discovery Order and Docket Control Order. In their motion (Dkt. No. 152), NNC and NNL join in the arguments made by NNI in its motion (Dkt. No. 150.) Google opposes NNC and NNL’s motion for the reasons set forth in its opposition to NNI’s motion, which was filed with this Court on today’s date. Google incorporates by reference the facts and argument set forth therein.<sup>1</sup> For the reasons set forth therein, this Court should deny NNC and NNL’s motion for a protective order.

DATED: September 26, 2014

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By /s/ David Perlson

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<sup>1</sup> Google has not served a subpoena for documents on NNC or NNL, as it has for NNI. This Court did, however, issue letters rogatory for NNC, the Canadian entity. To date, Google has not filed them with the Canadian court and therefore NNC has not yet received discovery requests from Google and has not produced any documents to Google.

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on September 26, 2014.

*/s/ Andrea Pallios Roberts* \_\_\_\_\_

Andrea Pallios Roberts